

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

**CURLING PLAINTIFFS' PROPOSED PROTOCOL
FOR SOURCE CODE INSPECTION**

Pursuant to the Court's December 13, 2023 Sealed Order Plaintiffs submit the following proposed protocol for inspection of the vote-changing software developed by Drs. Alex Halderman and Drew Springall and discussed in Dr. Halderman's July 2021 Expert Report. If the Court orders inspection of that software, the software shall be made available for inspection, in source code form, only to [SPECIFIC NAME] ("Reviewer") at a facility of Dr. Halderman's choosing located at the University of Michigan in Ann Arbor, Michigan, under the following conditions:

1. The source code files shall be placed on a password-protected laptop computer (the "Inspection Computer") in a secure, non-networked, non-Internet-

accessible environment configured by Dr. Halderman or someone at his direction for the inspection.

2. The Reviewer will be allowed supervised access during regular business hours, upon 48 hours' notice, on December 19 or 20, 2023.
3. Any inspection by the Reviewer at all times will be supervised by a Plaintiff representative and videotaped.
4. The Reviewer will not be permitted to bring any electronic equipment of any kind into the inspection review room.
5. The Reviewer will not be permitted to introduce any software or files onto the Inspection Computer.
6. The Reviewer will not be permitted to connect any hardware or other device to the Inspection Computer, whether directly or indirectly.
7. The Reviewer will not be permitted to alter, modify, add, or delete any files on the Inspection Computer, or otherwise copy any files or source code in any form, including in notes, photographs, recordings, or otherwise, except through the means provided in the following paragraph.
8. The Reviewer may request paper copies of discrete, limited portions of source code from the Inspection Computer by (i) identifying specific, narrow portions for Drs. Halderman and Springall; and (ii) showing with specificity how each requested portion is essential for use at trial. Plaintiffs may object to any such

request. The Court will resolve any such objections without accessing or reviewing any of the source code and will order any requested portions of the code produced only upon Defendants clearly and convincingly establishing that each requested portion of the code is essential for their defense at trial. Should the Court find that Defendants met their burden and order any requested source code produced, Dr. Halderman will provide any such code directly and only to the Court under seal.

9. The Reviewer must make copies of all notes taken during the review and leave a copy of those notes with Plaintiffs' representative before leaving the inspection facility.

10. Any information derived from the inspection governed by this protocol shall be Attorney's Eyes Only, and subject to the protections of the Protective Order in this case.

Respectfully submitted this 15th day of December, 2023.

/s/ David D. Cross
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